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June 10, 2020

VIA ECF

The Honorable Joel Schneider
United States Magistrate Judge
District of New Jersey

**RE: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation
Case No. 1:19-md-02875-RBK-JS**

Dear Judge Schneider:

I write to provide the Court with an update on my clients' discussions with Plaintiffs' counsel regarding the Motion to Modify ESI Search Terms. My clients include Defendants Aurobindo Pharma Ltd., Aurobindo Pharma USA, Inc., and Aurolife Pharma LLC (hereinafter "the Aurobindo Defendants").

Yesterday, I wrote to Plaintiffs' counsel addressing my clients' positions on the Motion and offered to meet and confer. Attached, please find a copy of my letter dated June 8, 2020. Counsel for the parties then had a productive meet and confer discussion. My clients proposed an alternative version of Mylan's counterproposal due to limitations on our vendor's program capabilities. Specifically, we proposed maintaining "AND" as a connector for the modifier terms wherever a proximity limitation of /50 had been proposed. Plaintiffs would not agree to this.

Defense counsel asked if Plaintiffs would continue to meet and confer as contemplated by all parties during their negotiations late last year and as memorialized in the Court's December 23, 2019 Order. (Dkt. 328). Plaintiffs are agreeable to this. The Aurobindo Defendants are confident the parties will be able to reach an agreement to refine and narrow the search terms as necessary in order to reduce unnecessary efforts and cost.

Respectfully submitted,

/s/ Jessica M. Heinz

Jessica M. Heinz

Enclosure

Cc: Adam Slater, Esq. (via email, for distribution to Plaintiffs' Counsel)
Seth A. Goldberg (via email, for distribution to Defendants' Counsel)
Jessica Priselac, Esq. (via email)
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